

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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LESLIE JACKSON,		:
	Plaintiff	:
-against-		:
		:
		:
		:
		: No. 15-CV-4167(ADS)(ARL)
LOWE'S COMPANIES, INC. and		:
DENNIS SHANLEY,		:
		:
	Defendant(s),	:
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**Motion by the Bromberg Law Office, P.C. and Fink & Katz, PLLC, Attorneys for  
Plaintiff, to Withdraw as Counsel for Plaintiff Leslie Jackson**

The Bromberg Law Office, P.C. and Fink & Katz, PLLC (collectively, “the Law Offices”), by and through Brian L. Bromberg, Jonathan R. Miller, and Jonathan A. Fink, for the reasons set forth in the accompanying Declaration of Jonathan A. Fink, dated October 11, 2016, move to withdraw as counsel of record for Plaintiff Leslie Jackson under Local Civil Rule 1.4. The grounds for this motion are as follows:

1. Irreconcilable differences have arisen between the Law Offices and Plaintiff that make it impossible for the Law Offices to continue to represent his interests in this matter.
2. The Law Offices request that the Court:
  - a. Allow the Law Offices to serve Plaintiff with these papers by email at [realthingmgt@yahoo.com](mailto:realthingmgt@yahoo.com), because Plaintiff advises that he has

sold his New York residence and moved to the Dominican Republic,  
but has refused to give any mailing address;

- b. Grant Plaintiff 30 days to obtain new counsel; and
- c. Stay these proceedings during the 30-day period.

3. The Law Offices certify that this motion is not being filed for purposes of delay.

4. The undersigned has not conferred with Defendants' counsel, but the circumstances are such that the Law Offices cannot proceed as Plaintiff's counsel.

5. Because the Law Offices have no way of communicating with Plaintiff other than by email and by cell phone, the Law Offices are sending these papers to Plaintiff by email and by sending Plaintiff a text advising him to check his email for these important papers.

6. Because of the nature of this application – a request to withdraw from representing a client who has moved out of the country and broken off all communications – presents no novel issues of law, the undersigned asks that the requirement of submitting a separate memorandum in support be waived.

Dated: New York, New York  
October 11, 2016

/s/ Jonathan A. Fink  
Jonathan A. Fink  
One of Plaintiff's Attorneys

**Attorneys for Plaintiff**

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